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8 Attorneys for Defendant,
CHI MANAGEMENT GROUP, L.P.

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 MIKAEL TJUATJA,

13 Plaintiff,

14 v.

15 CHI MANAGEMENT GROUP, L.P. SHORT
AND LONG TERM DISABILITY PLAN,

16 Defendant.
17

Case No. 08-0896-MMC

**REQUEST TO ATTEND
INITIAL CASE MANAGEMENT
CONFERENCE BY TELEPHONE**

18 Pursuant to Local Rule 16-10, Defendant CHI Management Group, L.P. requests permission
19 to participate in the initial case management conference, which is set for June 20, 2008 at 10:30
20 a.m., by telephone. The reason for this request is that Defendant's lead trial counsel, Stephen E.
21 Fox, is located in Dallas, Texas, and his schedule does not permit him to travel to San Francisco for
22 the conference.

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1 Defendant's counsel contacted Plaintiff's counsel, Timothy Fricker, about this matter, and
2 Mr. Fricker indicated that he is not opposed to this request.

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4 Dated: June 13, 2008

Respectfully submitted,

5 FISH & RICHARDSON P.C.
6

7 By: s/Nancy L. Stagg

8 Nancy L. Stagg
9 stagg@fr.com

10 Attorneys for Defendant,
11 CHI Management Group, L.P.
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PROOF OF SERVICE

I am employed in the County of San Diego, my business address is Fish & Richardson P.C., 12390 El Camino Real, San Diego, California 92130. I am over the age of 18 and not a party to the foregoing action. I am readily familiar with the business practice at my place of business for collection and processing of correspondence for personal delivery, for mailing with United States Postal Service, for facsimile, and for overnight delivery by Federal Express, Express Mail, or other overnight service.

On June 13, 2008, I served a copy of the following document(s):

**CHI MANAGEMENT GROUP, L.P.'s
REQUEST TO ATTEND INITIAL CASE MANAGEMENT BY TELEPHONE**

on the interested parties in this action by placing a true and correct copy thereof, enclosed in a sealed envelope, and addressed as follows:

Timothy J. Fricker
Tribune Tower
409 13th Street, 17th Floor
Oakland, CA 94612
Telephone: (510) 663-8484
Facsimile: (510) 663-0639

Attorney for Plaintiff

- ☐ **MAIL:** Such correspondence was deposited, postage fully paid, with the United States Postal Service on the same day in the ordinary course of business.
- ☐ **PERSONAL:** Such envelope was delivered by hand to the offices of the addressee.
- ☐ **FACSIMILE:** Such document was faxed to the facsimile transmission machine with the facsimile machine number stated above. Upon completion of the transmission, the transmitting machine issued a transmission report showing the transmission was complete and without error.
- ☐ **FEDERAL EXPRESS:** Such correspondence was deposited on the same day in the ordinary course of business with a facility regularly maintained by Federal Express.
- ☒ **CM/ECF:** Such document(s) were sent via electronic mail through the Case Management/Electronic Case File System with the U.S. District Court for the Northern District of California.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on June 13, 2008 at San Diego, California.

s/Christine Le

Christine Le